## REMEDIAL SITE ASSESSMENT DECISION - EPA REGION II

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EPA ID: NJD053513644 Site Name: KCS LIGHTING INC State ID:

Alias Site Names: STONCO

City: UNION

Refer to Report Dated: 4/15/2011 County or Parrish: UNION State: NJ

Report Developed By: Report Type: SITE INSPECTION 001

1. Further Remedial Site Assessment Under CERCLA (Superfund) is not required because:

2. Further Assessment Needed Under CERCLA:
Higher priority for further assessment

## Discussion/Rationale:

KCS Lighting Inc. Stonco Lighting Division operated on its property from 1979 to 2011. Their SIC codes of 3645 and 3646 indicate that they are involved in the production of electrical lighting for residential and commercial uses.

Stonco assembled lighting fixtures and characterized the work as light assembly with drilling and minor tapping. Stonco does not fabricate parts, but a portion of their current operations involves the finishing of premade cast lighting housing. The housing boxes are currently finished in a closed system where they are powder coated using dry electrostatic deposition with baking enamel. Some items requiring minor machining or custom coating are sent to machining areas or to the wet paint room. Light housings and components are assembled on lines and stored on pallets prior to shipping.

Prior to the dry finishing process, Stonco operated a wet paint line and generated F001 waste which is waste PCE, TCE, TCA and/or methylene chloride used in large-scale industrial degreasing operations. Between 1982 and 1985, Stonco manifested 2,860 gallons of F001 waste. The precise use of the chlorinated solvent is not known, but it was likely to have involved pre-painting degreasing and the cleaning of paint equipment. It is not known how the wastes were disposed between 1979 and 1982.

Due to a change of ownership in 1998, The Genlyte Group, Inc., the owners of Stonco, submitted an ISRA General Information Notice to the NJDEP, Division of Hazardous Waste Management. A Preliminary Assessment Report was prepared on behalf of Stonco by Blasland, Bouck and Lee, Inc in October, 1999. BBL investigated each potential area of concern at the Stonco facility and decided that only one needed further investigation.

BBL identified an area where two heating oil USTs had been closed in 1985. Because there was no information concerning the condition of the soils after the tank closures, BBL dug two test pits in the approximate locations of the former USTs to document soil conditions. Soil samples were collected from the two test pits and the results of the analysis indicated that in soil sample A-4 in concentration of 21,500 ppm exceeding the NJDEP SCC of 10,000 ppm. During the excavation of the test pits, BBL segregated soils that based on darkened colors and elevated concentrations from screening instruments, appeared to be contaminated. BBL estimated that one-half cubic yards of impacted soil was removed from the test pit and properly disposed. Because the TPH concentration of soil samples collected adjacent to sample A-4 were below the SCC, BBL argued that contamination had been horizontally delineated and no further actions were necessary. In soil sample A-3, PCE was detected at a concentration of 0.170 ppm, below the SCC of 1.0 ppm. It is not known how the PCE got to the subsurface at a depth that can only be speculated upon because BBL did not provide soil depths for any of their confirmatory soil samples. One possibility is the fact that the discharge wastewater pipe that drains two floor drains in the paint rooms connects to the main sewer pipe within several feet of the former UST areas. If PCE was disposed through the waste water discharge pipe and the pipe had leaked, then it was possible that PCE could have entered the soil and consequently the ground water.

Based upon their own research, NJDEP SA concluded there were two AOCs that required investigation. The first AOC was the former UST excavations where SA sought to confirm the detection of PCE in the soil by collecting ground water samples in the vicinity of the USTs and the process discharge pipe to the sewer. The second AOC was discovered when SA located a map of the Stonco building and noticed that two adjacent areas identified on the map were labeled 'chemical storage area' and 'hazardous waste storage area'. Because the two areas on the map are located adjacent to each other, SA treated them as one AOC. Both of these AOCs are located on the eastern portion of the plant and the investigation of these AOCs was independent of the subsurface investigation conducted on the western portion of the

Date: 05/15/2011

	te Name: KCS LIGHTI	NG INC		State ID:
Stonco plant.				
A row of homes are located Because the homes are located potential to be impacted by \	ated hydraulically crosso	astern side of the Stonce gradient to downgradien	o facility where the AO t of the Stonco AOCs,	Cs are located. the homes have the
Due to its documented use of beneath its site related to two Investigation is necessary to	o areas of concern, a re	elease attributed to Ston	ico has been documer	ited. An Expanded Site
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